

1 A F T E R N O O N S E S S I O N

2 (Whereupon this portion of
3 the proceedings were
4 stenographically reported
5 by Tracy Bartolomucci)

6 R O B I N L . J A C O B S O N
7 called as a Witness herein on behalf of Ameritech
8 Illinois, having been duly sworn on her oath, was
9 examined and testified as follows:

10 DIRECT EXAMINATION

11 BY MS. GIBNEY:

12 Q. Hi, Ms. Jacobson. Could you please state
13 your name and address for the record?

14 A. Robin Lynn Jacobson, 200 Center Street
15 Promenade, Room 735, Anaheim, California, 92805.

16 Q. Do you have in front of you what's been
17 marked as Ameritech Illinois Exhibit 2.0, which is
18 entitled the Direct Testimony of Robin Jacobson?

19 A. Yes.

20 Q. And that's obviously your direct testimony
21 in this case consisting of 11 pages?

22 A. That sounds right.

1 Q. And was this testimony prepared by you or
2 at your direction?

3 A. Yes, it was.

4 Q. Do you have any changes to the testimony?

5 A. No.

6 Q. If I asked you the same questions that are
7 in your direct testimony would your answers be the
8 same today?

9 A. They would.

10 Q. And do you also have in front of you what's
11 been marked as Ameritech Illinois Exhibit 2.1
12 consisting of 23 pages with attached exhibits RLJ -1
13 and RLJ-2?

14 A. That's right.

15 Q. And were these also prepared by you or at
16 your direction?

17 A. Yes, they were.

18 Q. Do you have any changes?

19 A. No.

20 Q. And if I asked you the same questions that
21 are in your Rebuttal Testimony, which is Exhibit 2.1,
22 would your answers be the same?

1 A Yes, they would.

2 MS. GIBNEY: Your Honor, I would move for
3 the admission of Ameritech Illinois Exhibits 2.1 and
4 2.0, as well as the attached Schedule RLJ-1 and 2.

5 EXAMINER WOODS: Objections? As previously
6 noted, the documents will be admitted upon receipt in
7 the electronic filing docket.

8 (Whereupon Ameritech
9 Illinois Exhibits 2.0 and
10 2.1 were admitted into
11 evidence as of this date.)

12 MS. GIBNEY: I would tender the witness
13 for cross examination.

14 EXAMINER WOODS: The witness is available
15 for cross.

16 MS. TAFF-RICE: Thank you, Your Honor. I
17 have not made an appearance yet, and I'd like to do
18 that at this time.

19 EXAMINER WOODS: All right.

20 MS. TAFF-RICE: My name is Anita Taff-Rice,
21 T-a-f-f hyphen R-i-c-e. I'm with Blumenfeld & Cohen.
22 The address is 4 Embarcadero Center, Suite 1170, San

1 Francisco, California, 94111.

2 CROSS EXAMINATION

3 BY MS. TAFF-RICE:

4 Q. Good afternoon, Ms. Jacobson. How are
5 you?

6 A. I'm fine, thank you.

7 Q. I'm going to ask you some questions to
8 start with based on your Direct Testimony. Do you
9 have that in front of you, Exhibit 2.0?

10 A. Yes, I do.

11 Q. On Page 1 of that testimony at Line 6 you
12 say that you're Regulatory Support and Reporting for
13 SBC Communications and that you support the Operation
14 Support Systems regulatory activities of Ameritech
15 Illinois, is that correct?

16 A. That's right.

17 Q. Can you tell me what you mean when you say
18 that you support the OSS regulatory activities of
19 Ameritech Illinois?

20 A. Yes. Any regulatory activities as a
21 result of an arbitration, lawsuit, hearings, filings,
22 that involve OSS, I represent that across the SBC 13

1 states, and so I write the testimony, the affidavits
2 and make the appearances.

3 Q. So you write testimony, you would review
4 filings before they were made, non-testimony filings?

5 A. I don't always get involved in reviewing
6 the filings before they're made, but in support of
7 filings.

8 Q. So, for example, somebody might call you
9 and say, Ms. Jacobson, I have a question about OSS,
10 can you tell me how that works, and then they would
11 put that into the filing?

12 A. That's quite possible. A big part of what
13 I do is respond to the questions of regulatory and
14 legal, in addition to writing the affidavits and
15 testimony.

16 Q. And did I hear you say you do that for the
17 13 state area?

18 A. Yes.

19 Q. Are you also involved in submissions to the
20 Federal Communications Commission as well?

21 A. Yes, but on a more limited basis.

22 Q. And can you describe that, please?

1 A. I do not have 271 responsibilities, so I
2 have everything related to OSS aside from 271.

3 Q. So, for example, would you be familiar with
4 an arbitration award that a CLEC got from SBC
5 Ameritech in any particular state?

6 A. It would depend if I had been involved
7 initially and was in receipt of that award and made
8 aware of it. Then I would review it to see what the
9 outcome was.

10 Q. Are you also responsible, for example, in
11 advising your client on how the company should comply
12 with those orders?

13 A. Well, not being an attorney I don't get to
14 make legal interpretations. I do usually sit on
15 teams or in discussion groups, more often with the
16 CLECs present, to discuss how something should be
17 implemented.

18 Q. Let me see if I understand that. If, for
19 example, there were an arbitration award that Rhythms
20 or Covad or Northpoint, any of the DSL providers had
21 gotten here in the state of Illinois, would you be
22 the person to whom SBC Ameritech would go and say,

1 what is our requirement in implementing this GUI,
2 what is our requirement in providing certain kinds of
3 information to the CLEC?

4 A. No, not necessarily. I would be privy to
5 that information, but we have a policy group and we
6 have product managers that do more the implementation
7 side. What I do is just keep abreast of that
8 information.

9 Q. Okay. Well, let me also kind of understand
10 a little bit more. Other than writing the testimony
11 or reviewing filings that go to regulatory agencies,
12 do you actually work in what we might call the
13 operational aspect of OSS? For example, do you
14 design interfacing?

15 A. No, I do not.

16 Q. Do you audit databases?

17 A. No, I do not.

18 Q. Do you provision loops?

19 A. No, I do not.

20 Q. Do you process service orders?

21 A. No.

22 Q. Do you ever perform loop qualification?

1 A. I have, just to see how it works and what
2 kind of information is returned.

3 Q. How recently did you do that?

4 A. What week is this? Probably two weeks ago.

5 Q. And can you describe a little bit about
6 that process for me?

7 A. And I didn't actually perform it
8 personally. I watched a service representative do it
9 because she knew what she was doing and I just kind
10 of wanted to understand the process and what needed
11 to be put in, what needed to be -- was returned. So
12 I watched using -- in this case they used Variegate,
13 and showed me how you could go through loop
14 qualification, how you could do an address
15 validation, get a telephone number assignment,
16 whatever the normal functions are if you're going to
17 provision or order DSL services.

18 Q. Is that here in Illinois?

19 A. I'm sorry?

20 Q. Was that here in Illinois?

21 A. No. Variegate is not currently available
22 in Illinois. That was done in Pacific Bell.

1 Q. I see. In California?

2 A. Yes.

3 Q. And was that at a Pacific Bell location?

4 A. Yes, it was.

5 Q. Have you ever done a loop qualification
6 from the location of ASI, the data affiliate in
7 California?

8 A. No. In fact, I don't even know where
9 they're located.

10 Q. Have you ever done a loop qualification
11 from a location on AADS, the data affiliate here in
12 Illinois?

13 A. No, I have not.

14 Q. Would you define for me what you consider
15 to be Operation Support Systems?

16 A. They're defined as the non-discriminatory
17 access to the functions of pre-ordering, ordering,
18 provisioning, maintenance, repair and billing.

19 Q. I didn't hear you say anything about
20 accessing information there. Is that not included?

21 A. I'm sorry. Information available through
22 those functions.

1 Q. Let me back up and ask some more specific
2 questions then. For example, you're familiar the
3 database called LFACS?

4 A. Only slightly, but yes. I've never used
5 it.

6 Q. Do you consider LFACS to be an OSS?

7 A. No, I do not.

8 Q. What about a database called TIRKS, are you
9 familiar with that?

10 A. Yes, I am.

11 Q. Would you consider that to be an OSS?

12 A. No, I wouldn't.

13 Q. Have you ever used TIRKS?

14 A. I -- again, in trying to prepare, I asked
15 someone to show me how to use it.

16 Q. You actually used it yourself --

17 A. No.

18 Q. -- or did you watch somebody else?

19 A. I watched somebody else. I just wanted to
20 see what the screens looked like and what kind of
21 information was in there. And to tell you the truth,
22 I couldn't read it. I couldn't even begin to read

1 it. And neither could the person who was showing me
2 how to use it because they only pulled out one
3 element, so they didn't care about the rest.

4 Q. For that one element that they pulled out
5 for you, did they explain to you what it was?

6 A. The one element that was pulled, and this
7 was in the LSC actually, was CFA information, which
8 is connecting facility assignment information, and it
9 was for the purposes of validating whether, I believe
10 they call it a port was available or in use, you
11 know. That would be the only reason they even use
12 it.

13 Q. Well, let me ask you, when you went in and
14 told whoever this person was that was actually
15 performing the query of LFACS, how did you describe
16 what you wanted them to do?

17 A. Well, I asked them if -- this was an
18 engineer who showed me LFACS, because that's the only
19 one -- retail doesn't have -- retail marketing
20 doesn't have access to it, so I had to find an
21 engineer. And I told him I wanted to see what LFACS
22 looked like. It was as simple as that.

1 So he pulled up the menu and I said, okay,
2 given the menu, here's the options, what would I do,
3 let's say, if I wanted to look at what circuits are
4 in this building, and that was the building that I
5 was in. And so he put that address in and then we
6 went to the various screens related to the Pacific
7 Bell building we were in.

8 Q. Were you trying to get him to show you the
9 kind of information that might be relevant, for
10 example, for provisioning DSL services?

11 A. No, actually, I wasn't. I was wanting to
12 see what the menu contained as far as what type of
13 functions you could do, and then I wanted to see --
14 just see the screen to see if I could, as a lay
15 person and not an engineer, interpret what the
16 information was.

17 Q. So you didn't make any attempt to find out,
18 in terms of LFACS, how LFACS might work in terms of
19 providing information that would be useful for
20 provisioning DSL services?

21 A. Not in that particular instance, but I did
22 talk to LFACS people. In fact, I have an attachment

1 of how LFACS works. I do know at a high level how
2 LFACS works and what it does. I wasn't interested in
3 finding that out. I already knew what its function
4 was as it's used internally.

5 Q. When you did this the demonstration with
6 the engineer, about how long did that take?

7 A. We only spent maybe 10, 15 minutes. He
8 doesn't do it on a regular basis so it took him
9 awhile to just navigate through the system himself.

10 Q. Well, how did he figure out how to use the
11 system if he doesn't use it very often?

12 A. He has used it. He has been trained in it,
13 but it's not his regular function. So he had access
14 to it. Obviously, you'd have to have a password.
15 And it's something I couldn't do. If I sat down at a
16 terminal I wouldn't be able to do it.

17 And so he -- not using it on a regular
18 basis he did have to think about how to navigate
19 through it, and he was able to point out very few
20 things, actually, that he knew. I mean, LFACS is a
21 system that's primarily triggered by the service
22 order, so it's not a system that somebody uses to

1 extract information.

2 Q. Have you ever heard of something called the
3 loop assignment center, Ms. Jacobson?

4 A. Yes, I have.

5 Q. What is that?

6 A. That's an internal group to the ILEC that
7 is responsible for the assignment of cable impair on
8 a service order, except that they use LFACS for that
9 purpose. The only time the loop assignment center
10 becomes involved is when it doesn't float through or
11 there's not available facilities, and so you have to
12 look to see if there's something available maybe
13 nearby, do a work order. They don't use LFACS to
14 assign orders. LFACS is automatic. It's triggered
15 by the order.

16 Q. Let me back up and ask you, you said it's
17 in the ILEC. By that you mean Ameritech Illinois has
18 a loop assignment center?

19 A. To my understanding. It may not be called
20 that exact thing, but everyone -- I mean, to my
21 understanding, an ILEC has a center or a group of
22 people responsible for that assignment function.

1 Q. And every state, I suppose, would have one
2 of those in the SBC Ameritech region?

3 A. I don't know if they have them individually
4 in each state, because I know for a fact in
5 Southwestern Bell it's one system.

6 Q. So there's one place where you could sit
7 down at a terminal and you could see data for the
8 whole five state region?

9 A. Perhaps. And unfortunately I can't say
10 that for a hundred percent, because when I did it it
11 was for Pacific and Pacific is independent. There
12 weren't any other states to look at, so it didn't
13 give me an option to have to choose. So when I say
14 that, I mean, there's one LFACS but whether it's
15 divided by state, I don't know that.

16 Q. These people who sit in the loop
17 assignment center, isn't their job to be able to
18 assign cable impair when somebody places an order?

19 A. Well, they don't assign cable impair when
20 someone places an order unless the system fails to be
21 able to do that.

22 Q. Do these people use LFACS?

1 A. To my understanding, they use LFACS to
2 update it, to actually put into it information that
3 is pertinent to the system, to correct information
4 that may exist in the system, or in the case of a
5 lack of facilities they may look for other
6 facilities. I really don't know their exact
7 function. I've never been in a loop assignment
8 center. I know that the outcome of their function is
9 that an order either gets an assignment or gets a
10 work order, a job, so -- to put facilities in place.

11 Q. Well, you mentioned that the reason that
12 you went to look at LFACS was because you wanted to
13 look for information that was in there. Isn't it
14 correct that loop qualification pulled information
15 from LFACS?

16 A. Well, if you're talking at Ameritech it's
17 different, because at Ameritech it goes to LFACS and
18 then it gets a terminal address and then it goes to
19 ARES and by terminal pulls the loop.

20 Q. So both LFACS and ARES have loop
21 qualification information in them?

22 A. Absolutely.

1 Q. You just said a couple minutes ago that
2 these people in the loop assignment center, when
3 they're trying to decide how to assign a loop, one of
4 the things that they would do is if there was a lack
5 of facilities they would go look somewhere else.
6 Where is the somewhere else?

7 A. Well, that's an assumption I'm making
8 because they're not going to say, there's no
9 facilities at this location so we just turn this
10 order back. I mean, they're going to look. I mean,
11 I think we've all talked before about line station
12 transfers, so there may be an opportunity for them to
13 look for another available loop out of the same
14 terminal that they could switch to. I mean, I don't
15 know their function. I'm assuming that the outcome
16 of their function is to get a loop to that location
17 based on that service order.

18 Q. You just mentioned a line and station
19 transfer. That's sometimes called a LST, is that
20 right?

21 A. That's right.

22 Q. What that means is if you go into LFACS,

1 you're looking, you're trying to assign a loop to a
2 particular customer and you find out a facility is
3 not available, you can go look, you can find out if
4 there's another loop somewhere in the loop plant that
5 will serve that customer suitably, and you do a line
6 and station transfer, which means that you throw the
7 loop over to this other existing facility that will
8 serve the customer, isn't that right?

9 A. I am not sure that LFACS would be the
10 source of that information. I'm saying that loops
11 are in LFACS, so if you know where a vacant loop
12 exists you may be able to look it up based on your
13 knowledge of that, otherwise you may need to go to a
14 drawing or to a map that tells you where all the
15 loops are so you can start to look for an available
16 loop. It's not as simple as, here they all are laid
17 out for you and you just pick and choose.

18 Q. Well, don't you think it's fair that if a
19 CLEC wanted to provide DSL service to an end user and
20 they found out that the loop in question in the
21 customer premise right now was unsuitable for some
22 reason, such as having DAML on it, don't you think it

1 would be fair that the CLECs would have the
2 opportunity to go look and see if there was another
3 loop that would serve that customer?

4 A. Well, I'm not saying it would be unfair for
5 you not to be able to either, because the system will
6 pick out the most appropriate circuit and it will
7 skip over -- it will actually ignore one with
8 disturbers on it if there's another one that doesn't
9 have it. So it already does that sort of looking at
10 that location.

11 If it's a different terminal circuit not at
12 the customer prem but at that serving terminal, as I
13 understand it, and I'm not in any way a network
14 expert or technically knowledgeable on this, then
15 there is a way that the loop assignment center would
16 have, I'm assuming, to find that other loop.

17 Q. Let me just try to encapsulate that because
18 that was a little bit confusing to me. My question
19 was, if a person at Ameritech Illinois or a person at
20 AADS discovered that for some reason they could not
21 provide DSL service on a loop that currently serves
22 the customer premise, don't you think under the

1 non-discrimination provisions of the Telecom Act that
2 a CLEC should be able to do exactly what either the
3 Ameritech Illinois employee or the AADS employee can
4 do to rectify that problem?

5 A. In answer to that, to begin with, AADS
6 doesn't have anything in addition to what every other
7 CLEC has.

8 Q. That wasn't my question.

9 A. No, but you're making an assumption that
10 they have the ability to look in LFACS or do whatever
11 to find another circuit. They don't find another
12 circuit. If you place an order, LFACS finds the
13 circuit for you. If, in fact, it cannot assign a
14 circuit because there is not one available that meets
15 the parameters of your order and it goes through a
16 number of algorithms, a number of factors based on
17 what you put on your service order to determine what
18 it needs to find, then the loop assignment center
19 will get involved in perhaps trying to find another
20 facility rather than just turn every order back.

21 Because in the case of a residential --
22 California, in particular, and Ameritech, I assume,

1 is a lot the same way, residences are -- have been
2 built there since the 1950s and they have one drop,
3 one line. So you want a second line, you're not
4 going to find available facilities. You're going to
5 have to look for something in that area to provide to
6 that customer from that terminal box that's out at
7 the end of the block.

8 Q. I'm just going to ask you that -- I know
9 you're probably eager to share information with us
10 about what you know, but I'm going to ask if you can
11 just try to confine yourself to the question that I
12 asked because we're a little bit pressed for time
13 today.

14 And all I'm trying to understand is that
15 if, for some reason, the loop that currently serves
16 the customer's premise is not suitable to provide
17 DSL, there is a process in place called a line and
18 station transfer which is available to Ameritech
19 Illinois and available to AADS to go find a loop that
20 will work, shouldn't that be available to CLECs as
21 well? Just yes or no, if you can answer it that way.

22 A. I don't think I can give you a yes or no

1 unqualified.

2 Q. So you have no opinion?

3 A. Because it is available to CLECs. We do
4 the same thing for a CLEC order that we do for an
5 Ameritech order. The loop assignment center will do
6 exactly what it needs to for your order as it would
7 for an Ameritech order.

8 Q. Why don't we just move on.

9 You said earlier -- I asked you several
10 systems and asked you whether you thought those were
11 OSS. I mentioned LFACS, I mentioned TIRKS and I
12 mentioned SWITCH, and I believe you said you don't
13 think any of those are OSS, is that right?

14 A. I don't think you mentioned SWITCH, but if
15 I were to include that I would say no, it's not an
16 OSS.

17 Q. And why is that?

18 A. Because they are databases. They are back
19 office databases. They do not provide OSS
20 functionality, they merely provide the information to
21 the functionality. If you're asking for a particular
22 piece of information through pre-ordering, for

1 instance, then it will search for that particular
2 piece of information in a back office database, and
3 that back office database would be TIRKS or SWITCH or
4 LFACS or wherever that information may be contained.

5 Q. Do you happen to have a copy of the Union
6 Remand Order with you, Ms. Jacobson?

7 A. No, I do not.

8 MS. TAFF-RICE: Counsel, do you have one
9 you could give her?

10 MS. GIBNEY: Uh-huh.

11 Q. (By Ms. Taff-Rice) Could you turn to Page
12 191, please.

13 A. All right.

14 Q. Do you see that right above Paragraph 425
15 there's a little A and that says "definition of OSS"?

16 MS. GIBNEY: I'm sorry, what paragraph are
17 you on?

18 MS. TAFF-RICE: Paragraph 425.

19 A. Which is on Page 192 from this copy. Yes.

20 Q. (By Ms. Taff-Rice) So is it fair to assume
21 that the paragraph that follows that is how the FCC
22 has defined OSS?

1 A. Just a moment, let me review it. I would
2 say that's a fair statement.

3 Q. Okay. And if you wouldn't mind, could you
4 read the second sentence in Paragraph 425 that begins
5 with the words "OSS includes --"?

6 A. "OSS includes the manual, computerized and
7 automated systems together with associated business
8 processes and the up-to-date data maintained in those
9 systems." Do you want me to go further?

10 Q. And could you just read the last sentence
11 in that paragraph that starts, "Specifically, the
12 Commission identified --"?

13 A. "Specifically, the Commission identified
14 the five functions of OSS that incumbent LECs must
15 make available to competitors on an unbundled basis:
16 pre-ordering, ordering, provisioning, repair and
17 maintenance and billing."

18 Q. And in the footnote 835 at the end of that
19 sentence, could you read that also?

20 A. "Local competition first report and order,
21 11 FCC read at 157 64-66, Paragraphs 518 and 523.
22 OSS are composed of varied systems databases and

1 personnel that an incumbent LEC uses to commercially
2 provision telecommunication services to its
3 customers, resellers and the purchasers of unbundled
4 network elements."

5 Q. Now that you've read that definition that
6 the FCC has of OSS, does that change your mind as to
7 whether LFACS, TIRKS and SWITCH are OSS?

8 A. No, it does not.

9 Q. So LFACS, TIRKS and SWITCH are databases
10 that contain information about the outside plant and
11 Ameritech Illinois, but you don't think that complies
12 with the definition that you just read?

13 A. Given the definition that I just read,
14 taken out of the context of this paragraph you could
15 make that assumption. However, the last sentence
16 that says, "identified the five functions of OSS," if
17 you go back to the first sentence where it says "the
18 first report and order the Commission defined OSS as
19 consisting of pre-ordering, ordering, provisioning
20 maintenance and repair and billing functions
21 supported by an incumbent LEC's databases and
22 information." It's supported by the information in

1 those back office systems, it is not comprised of
2 those systems.

3 Q. Well, I guess I'm not sure what you mean by
4 that. I mean, you either -- these are
5 functionalities that must be supported through CLECs,
6 and in order to support the functionality don't you
7 have to use the system and get to the data that's in
8 there?

9 A. In order to support the function you have
10 to be able to provide the information in that
11 function, so if you're doing a pre-ordering function
12 such as loop qualification and there are 45 loop
13 qualification elements that we provide, the Gateway,
14 or the GUI, as the case might be, goes out and
15 searches the various back office systems for that
16 information and returns it in that pre-ordering
17 function in response to that function.

18 Q. So CLECs have a right to get information in
19 your databases?

20 A. That's right.

21 Q. Okay. Thank you.

22 You mentioned in a couple different places

1 in your testimony your opinion as to whether SBC
2 Ameritech is in compliance with various FCC orders.
3 One of them is the Remand Order. I think you
4 asserted you're in compliance with the line sharing
5 order. You mentioned in other places that you think
6 you're in compliance with the Telecommunications Act.
7 Is that a fair assessment of your testimony?

8 A. Yes, it is.

9 Q. And specifically, on Page 4 of your Direct
10 Testimony, if you'd turn to that, beginning on
11 Page -- excuse me, beginning on Line 14 and going
12 down to Line 16, you say that Ameritech Illinois has
13 an obligation to provide CLECs with
14 non-discriminatory access to its OSS. Is that a
15 correct reading of your testimony?

16 A. Yes.

17 Q. And is that non-discriminatory aspect that
18 you're describing, is that solely from the Telecom
19 Act?

20 A. I wouldn't say it's solely from the Act.
21 There's been a number of rulings and other -- other
22 requirements of the companies, so no, I don't think

1 that we're just in compliance with the Act.

2 Q. Well, for example, is there a
3 non-discriminatory aspect in the Union Remand Order?

4 A. Yes, there is.

5 Q. And is that what you're referring to on
6 Line 21 when you say that Ameritech Illinois has to
7 give competing carriers access to OSS functions in
8 substantially the same time and manner as the ILEC
9 provides to itself or other carriers?

10 A. I don't remember saying that came out of
11 the Union Remand Order. I think I'm still referring
12 to the Telecom Act.

13 Q. So you don't think that's a requirement of
14 the Union Remand Order?

15 A. No, I didn't say that. I thought your
16 question was did I take this part of my testimony
17 from the Union Remand Order.

18 Q. I'm just trying to understand. When you
19 say that you have to give CLECs access to OSS in
20 substantially the same time and manner, it sounds
21 like a non-discrimination requirement to me. And
22 we've established that the Telecom Act requires

1 non-discriminatory treatment, and I asked you if
2 there was any other order that did that, and
3 specifically, I'm wondering, does the Union Remand
4 Order require that?

5 A. Yes, I believe it does. But I think the
6 key word here is "substantially." It doesn't say
7 exactly.

8 Q. Well, let's talk about that then. Why
9 don't you turn to Page 6 of your Direct Testimony,
10 which is Exhibit 2.0, and at Line 23 I see a sentence
11 that says: "Ameritech Illinois treats AADS exactly
12 like any other CLEC that provides xDSL service to end
13 users in Illinois." Is that a correct reading of
14 your testimony?

15 A. Yes, it is.

16 Q. So what do you mean by that when you say
17 exactly?

18 A. I mean that AADS has exactly the same
19 access to OSS that any other CLEC has.

20 Q. As what?

21 A. As any other CLEC.

22 Q. Okay. And at the end of that sentence it

1 goes on to say: "-- like any other CLEC that
2 provides xDSL service to users in Illinois, and
3 provides AADS with exactly the same loop
4 qualification information provided to any data CLEC."
5 Is that correct?

6 A. That's right.

7 Q. What you're saying is you give AADS what
8 you give other CLECs, right?

9 A. They have the same access to the same
10 information.

11 Q. The access is the same?

12 A. The access is the same. The offering of
13 the access is the same. We have several ways to
14 access information. They get the same suite of OSS
15 offerings that any other CLEC gets. What they choose
16 to use out of that may be different than what another
17 CLEC chooses to use.

18 Q. Well, let me back up and just make sure I
19 understand here, because what I think you're saying
20 in your testimony is there's really two components;
21 there's the access to the information and then
22 there's the information itself, isn't that right?

1 A. Well, I don't consider -- well, there is
2 access to the functionality and the information is
3 what you get from that functionality, from accessing
4 that functionality.

5 Q. Okay. And are you trying to say in this
6 sentence that the access that you give to CLECs is
7 exactly the same as the access that you give to AADS?

8 A. Well, assuming that there's another CLEC
9 out there that uses the same OSS that AADS does, then
10 that would only be exact to that CLEC, but the
11 offerings to AADS are the same. They have the same
12 ability.

13 Q. So if, for example, a CLEC provided
14 different kinds of DSL service than AADS did, can you
15 assure me that the CLEC is getting all the
16 information they need to support their service?

17 A. The information we provide is not by
18 technology. It has nothing to do with what kind of
19 technology you're providing. You asked for
20 information related to DSL in qualifying a loop. You
21 get the same information. If you tell us the
22 technology you're going to provide your end user then

1 we will base your information on that given
2 technology. If you don't tell us then we will make
3 an assumption, which was agreed to in the advance
4 services plan of record, that it will be DSL
5 information that we will return, otherwise we
6 wouldn't know what to return.

7 Q. Wouldn't it take a lot of burden off your
8 shoulders if instead of trying to go and figure out
9 what we need to just let us go back there and get the
10 data that we actually want?

11 A. No.

12 Q. Why not?

13 A. When you say "burden," it's a mechanical
14 process so there's no burden. It's already there.
15 We've already provisioned all 45 elements to be
16 returned to you. We're, on a daily basis, updating
17 our records so that more information is available
18 electronically and we have to go off and do less
19 manual searches. But no, I don't see it relieving
20 any burden, other than it would put a burden on the
21 back office systems that were not designed to have
22 multiple users, to the extent that if every CLEC were

1 in LFACS looking up various addresses and circuits,
2 that would put a burden on LFACS that may, in fact,
3 bring that system down or compromise it so that no
4 CLEC gets the information they need. The system was
5 not designed for that purpose.

6 Q. Okay. Well, let's talk about that a little
7 bit then. What you're saying is if -- it's like the
8 year when they had the two different football teams
9 from New York and they were both in the Super Bowl,
10 and everybody was afraid that at the commercial break
11 the plumbing was going to explode because everybody
12 would go to the bathroom at the same time. Is it
13 that kind of a problem?

14 A. Well, I don't think you can make the same
15 analogy. Obviously, if something is designed for a
16 particular quantity over a given time of hits, and
17 then if everybody went to use the plumbing in New
18 York at the same time and it wasn't designed for
19 every single person in New York to use it at the same
20 time then potentially it would fail.

21 EXAMINER WOODS: Because that's a lot of
22 hits, right?

1 A. Right. Because that's a lot of -- there's
2 a lot of people in New York. But LFACS we know was
3 not designed for this purpose, and therefore does not
4 have the capacity. We have already --

5 Q. (By Ms. Taff-Rice) The Gateways that you
6 have in place now, if we come in through those, too
7 many of us at the same time, the system could grind
8 to a halt?

9 A. LFACS could grind to a halt?

10 Q. I don't know which systems you have in
11 mind, Ms. Jacobson.

12 A. Every CLEC is not going to be accessing a
13 piece of information from LFACS through the Gateway
14 at the same time, but a CLEC that has access to LFACS
15 would have every one of their representatives
16 possibly logged in to LFACS at the same time,
17 potentially.

18 That's what our reps do. They access every
19 system in the morning, log on, put them on their
20 screen to use throughout the day. Now, if you had
21 access to every back office system, including LFACS,
22 I'm assuming that your reps are not going to go in

1 and out all day long; have a log on, go through the
2 whole log on script, put the password in and do all
3 of that. They're going to pull that system up and
4 make it available as they need it throughout the day.

5 Q. So what's your basis for that opinion?
6 Have you ever asked to see that?

7 A. Because that's how we do it, and I'm
8 assuming that we've been in the business as long as
9 we have and we've figured out what's the best way to
10 be efficient.

11 Q. Ms. Jacobson, does Ameritech Illinois
12 provide DSL service?

13 A. No.

14 Q. So the experience that Ameritech Illinois
15 has had in terms of accessing LFACS to get loop
16 provisioning information doesn't exist, does it?

17 A. For DSL services?

18 Q. Right. That's what we're talking about in
19 this case; we're talking about DSL services only. So
20 you're telling me the experience you know of service
21 reps at Ameritech Illinois, and that has nothing to
22 do with DSL service because you don't provide it, do

1 you?

2 A. The experience that I'm recounting is not
3 related to LFACS, it's relating to the use of
4 systems, any system. Any system has a capacity.

5 Q. Great. Let's talk about that, because this
6 is very important. If the CLECs are going to
7 compete, they're going to need access to information
8 to find out whether a loop is suitable for the right
9 DSL service or not, so help me to understand.

10 When you say -- and I assume that you're
11 referring to your Rebuttal Testimony where you say
12 that if too many people try to get on at the same
13 time through the Gateway a problem could occur and,
14 in fact, the whole system could fail?

15 A. That's right.

16 Q. So tell me, the current systems that you
17 have right now, which systems do you have in mind?
18 Are you thinking about LFACS, are you thinking about
19 TIRKS?

20 A. I think LFACS is particularly vulnerable
21 because it is an older system, and we have been told
22 by Telecordia, who developed LFACS and would have to

1 make any upgrades to it, that it will not support the
2 type of use that there is the potential for.

3 Q. Okay.

4 A. And that it would have to be upgraded in
5 order to support that.

6 Q. LFACS is maybe 20, 30 years old, you said?

7 A. I don't know how old it is. I know it's
8 one of the older ones versus TIRKS or SWITCH, the
9 other two that you mentioned.

10 Q. Well, even if it were only 10 years old --
11 can you assume that with me?

12 A. Uh-huh.

13 Q. If LFACS were 10 years old, would you think
14 it's fair to say that the number of Ameritech
15 Illinois employees who access LFACS today is exactly
16 the same as the number of Ameritech Illinois
17 employees who accessed it 10 years ago?

18 A. No, I would not say that. Obviously not.

19 Q. Do you think there are more or less
20 employees who would access it today?

21 A. Given our pension for downsizing, it could
22 very well be less.

1 Q. So when the system was designed 10 years
2 ago it was designed to handle more inquiries than are
3 currently happening today, is that your testimony?

4 A. No, it's not. I said it could. I have no
5 idea.

6 Q. So you don't have any idea how many
7 Ameritech Illinois employees access LFACS on a daily
8 basis?

9 A. I have no idea.

10 Q. Do you know what is the total of capacity
11 of LFACS, how many number of transactions it can
12 handle in a second, for example?

13 A. No, I do not.

14 Q. Do you know how many transactions it can
15 handle in a hour?

16 A. No, I do not.

17 Q. Do you know how many transactions it can
18 handle at all?

19 A. No. I am an OSS expert, not a back office
20 database expert.

21 Q. Well, Ms. Jacobson, you were saying in your
22 testimony that you are convinced that if CLECs get

1 access to these databases, LFACS in particular, too
2 many of us at the same time are going to cause your
3 system to crash, so I need to understand specifically
4 what the basis is for that assertion. Can you tell
5 me sitting here today what is the simultaneous
6 capacity for LFACS?

7 MS. GIBNEY: Objection. I think that's
8 been asked and answered that she doesn't know.

9 EXAMINER WOODS: I agree.

10 Q. (By Ms. Taff-Rice) Can you tell me what is
11 the simultaneous access capacity for TIRKS?

12 A. No.

13 Q. Can you tell me, if I were to ask you the
14 same question about any of the databases that we've
15 talked about today, SWITCH, would you know that?

16 A. No.

17 Q. Then how are you certain that CLEC
18 employees who access this database would cause it to
19 go over a threshold that would cause the system to
20 fail?

21 A. In -- and I apologize for referring back to
22 California, but LFACS is LFACS when it was originally

1 rolled out by Telecordia, or at the time Bell Cord
2 (phonetic).

3 In California we filed testimony that
4 became part of the 271 affidavit by LFACS experts
5 that said it could not handle use by CLECs to the
6 degree that they could potentially use it, that it
7 would cause failure. And it's documented and it's
8 filed in the March, 1998 271 OSS affidavit, and as a
9 result of that we were not ordered by the California
10 Commission to provide access to LFACS or to any other
11 back office system, because that was an issue in
12 California.

13 In the workshops of 1998 one of the big
14 issues was direct access, and so as a part of our
15 compliance requirements we were required to support
16 our position, and when we filed our compliance filing
17 we did support that position and the order was that
18 we did not have to provide back office access.

19 Q. Ms. Jacobson, do you have 271 authority in
20 California today?

21 A. I had it in 1998. We reorganized in
22 January of this year and I --

1 Q. Pacific Bell has authority to provide long
2 distance service in California?

3 A. Maybe I misunderstood your question. You
4 said authority or responsibility?

5 Q. You used the word order. You said the
6 order said we did not have to give access to LFACS.
7 What order did you have in mind?

8 A. The order that came out after the workshops
9 on our compliance with the items that were discussed
10 and put before the Commission. They ordered certain
11 things to happen for Pacific Bell to get in
12 compliance, and one of them was direct access and we
13 were not ordered to provide that.

14 Q. So are you telling me today in your
15 testimony that in California you have a final order
16 from the California Public Utilities Commission in
17 the 271 proceeding?

18 A. No, of course not. We only have 271 in
19 Texas. I think we all know that.

20 Q. So whatever the Commission may have or may
21 not have said in the order is not binding on you at
22 this moment; it is not a final order, is it?

1 A. It was a final outcome of that period of
2 time where we negotiated those issues.

3 Q. Two years ago? Is that a yes?

4 A. That's a yes.

5 Q. Okay. All right. Well, let me ask a
6 little bit more about the capacity of the system.
7 Let's just confine ourselves to Illinois, if we can,
8 because I think that's what's relevant here. Do you
9 know how many CLECs provide DSL service in Illinois?

10 A. No, I do not.

11 Q. Do you have a guess?

12 A. No.

13 Q. Does 10 sound right to you?

14 A. Probably not. I would guess it's more.

15 Q. Does 20 sound right to you?

16 A. You know, I would merely be guessing. I
17 told you I don't know. There's 200 in Texas. I
18 don't know how many there are in Illinois. I don't
19 even know for sure that it's still 200. They come
20 and go so fast that at any given point in time you
21 can't say how many there are.

22 Q. So you don't know. Could you just assume

1 with me, for the sake of argument, that there's
2 probably maybe 20 CLECs that provide DSL service in
3 Illinois?

4 A. Is that a hypothetical you're asking me?

5 Q. This is a hypothetical.

6 A. Then I'll make that assumption.

7 Q. And isn't it right that the only thing
8 we're talking about in this case is DSL service
9 providers? I'm not talking about voice providers or
10 anything else.

11 A. Right.

12 Q. So the relevant inquiries to LFACS that
13 we're talking about also are just inquiries that are
14 to be made to LFACS to find out loop provisioning
15 information for DSL services, right?

16 A. Well, LFACS is used for other purposes, as
17 far as internally there's complex services that have
18 to be provisioned out of LFACS. All voice services
19 have to be provisioned and assigned out of LFACS.
20 LFACS is not a DSL system. It is a cable impair
21 inventory for every product, every service provided.

22 Q. Ms. Jacobson, I understand that, but I want

1 you to understand that my questions are directed to
2 DSL service, as that's the only thing at issue in
3 this case.

4 A. I understand.

5 Q. And we've established that there is some
6 information in LFACS that is relevant to DSL service,
7 isn't that right?

8 A. That's right.

9 Q. So just keeping that in mind, and my
10 assumption that there's maybe 20 DSL providers in the
11 state of Illinois, if they were to get access to
12 LFACS, let's just say each of these people had one
13 terminal that they could use to access LFACS. That
14 would only add 20 users to the system, wouldn't it?

15 A. Given that hypothetical, yes.

16 Q. Okay. And even if we said that each of the
17 CLECs had 10 terminals, that would still only add 200
18 to the system, right?

19 A. That's right.

20 Q. Okay. Do you have any idea how many
21 employees work at Ameritech Illinois?

22 A. That have access to LFACS or that work at

1 Ameritech Illinois?

2 Q. That just work at Ameritech Illinois.

3 A. No, I do not.

4 Q. Do you have any idea how many employees at
5 Ameritech Illinois have access to LFACS?

6 A. No, I do not, but it's a very minor number
7 relative to the overall employment of Ameritech
8 Illinois.

9 Q. Well, give me a ball park ratio then; 20
10 percent, 30 percent?

11 A. No. My belief is it's far below 20
12 percent.

13 Q. Okay. You don't know how many employees
14 work at Ameritech Illinois and you don't know how
15 many actually have access to LFACS but you're certain
16 the percentage is lower than 20 percent?

17 A. That's right.

18 Q. How do you know that?

19 A. Because we have a relatively small group in
20 any one of our states of engineers or the people that
21 do that type of work compared to the number of
22 service reps and technicians and all the people that

1 can be employed by any given ILEC.

2 Q. Okay. Let me ask you this: Do you have
3 a -- for lack of a better word I'm going to call it
4 a systems administration department at Ameritech
5 Illinois?

6 A. I have no idea.

7 Q. Let me describe what I mean by that. Do
8 you have a person or persons that work at Ameritech
9 Illinois that are in charge of making sure that
10 computer systems work properly?

11 A. I don't believe there is one group that
12 does that, no. We have some 600 systems within
13 Ameritech that do various functions from human
14 resources, you know, job applications, to producing
15 phone bills to doing whatever they do. There's some
16 600 systems. My belief is that whoever has the
17 responsibility for a given system, if it's an
18 application manager, which is normally what we have,
19 then they're responsible for that system operating
20 properly.

21 Q. Okay. But there's somebody that works at
22 Ameritech Illinois to make sure that the computer

1 systems are maintained properly, that there's enough
2 computer terminals for various employees to use,
3 isn't that correct?

4 A. There is somebody responsible for the
5 computer working properly. It would be a different
6 somebody that decides how many terminals need to be
7 in a particular location.

8 Q. Okay. So you have several different
9 resources to draw on for that sort of thing. Do you
10 suppose that part of the job of those people is to
11 try to make sure the systems are sized properly to
12 handle the load that's going to be coming in to them?

13 A. Yes.

14 Q. Do you know that for sure?

15 A. Yes. We always have the need to scale.
16 Anything that we develop or provide or have to
17 upgrade you would have to consider the scale of use.

18 Q. Wouldn't that be true of databases, access
19 to databases?

20 A. It would depend. I mean, some databases --
21 like LFACS was provided to Ameritech by Telecordia,
22 who developed this system, and at the time Ameritech

1 defined its needs for that system, and at that time
2 there was not a Telecom Act of 1996 and no one
3 anticipated the fact that it would be used by anyone
4 outside of Ameritech.

5 Q. But I would think that that person would
6 have to account for just internal expansion, like
7 when you add new units like cellular units, for
8 example, or Internet access units or data affiliates.
9 I mean, isn't there somebody at Ameritech Illinois
10 who keeps track of that and makes sure that the
11 computer systems are big enough to handle whatever
12 load the employees are going to put on it?

13 A. I would agree with that, but I would not
14 agree with the technology that you named. I mean, I
15 think when LFACS was developed no one was thinking
16 about Internet access or DSL. I mean, those
17 technologies weren't here.

18 (Break.)

19

20

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22

